

1 CARLETON R. BURCH  
 2 Nevada Bar No. 10527  
 3 [crb@amclaw.com](mailto:crb@amclaw.com)  
 4 VINCENT JAMES JOHN ROMEO  
 5 Nevada Bar No. 9670  
 6 [vjlr@amclaw.com](mailto:vjlr@amclaw.com)  
 7 ANDERSON, McPHARLIN & CONNERS LLP  
 8 601 S. Seventh Street  
 9 Las Vegas, Nevada 89101  
 10 TELEPHONE: (702) 479-1010 ♦ FAXSIMILE: (702) 479-1025  
 11 Attorneys for Defendants ARTHUR J.  
 12 GALLAGHER & CO.; and ARTHUR J.  
 13 GALLAGHER RISK MANAGEMENT  
 14 SERVICES, LLC (erroneously sued as Arthur J.  
 15 Gallagher Risk Management Services, Inc.)  
 16

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 ARMOROCK, LLC,  
 13 Plaintiff,  
 14 vs.  
 15 ARTHUR J. GALLAGHER & CO.;  
 16 ARTHUR J. GALLAGHER RISK  
 17 MANAGEMENT SERVICES, INC.,  
 18 Defendants.

Case No. 2:25-cv-00553-GMN-EJY

**STIPULATION AND ORDER TO ALLOW  
AMENDED COMPLAINT AND SET  
TIME FOR ANSWER**

19 The Defendant, ARTHUR J. GALLAGHER & CO. and ARTHUR J. GALLAGHER RISK  
 20 MANAGEMENT SERVICES, LLC (erroneously sued as Arthur J. Gallagher Risk Management  
 21 Services, Inc.), (“Defendant”) acting by and through their counsel, Anderson, McPharlin &  
 22 Connors, LLP and the Plaintiff, Armorock, LLC (“Plaintiff”), (collectively the Plaintiff and the  
 23 Defendant are referred to herein as the “Parties” or the “Party”), by and through their counsel  
 24 Semenza Rickard Law Respectfully submit this Stipulation and Order regarding Plaintiff’s filing  
 25 an Amended Complaint and the Defendant’s Answer thereto.

**WHEREAS:**

26 1. Plaintiff filed its original Complaint in the Clark County, Nevada District Court, Case  
 27 Number A-25-912796-C on February 14, 2025.

28 ////

Case No. 2:25-cv-553

1           2. Defendant executed an “Acceptance of Service” on February 24, 2025, which pursuant  
 2 to Nevada Rules of Civil Procedure Rule 4.1 allowed Defendant 60 days to respond to Plaintiff’s  
 3 Complaint. Making the original response date not later than April 25, 2025.

4           3. Defendants filed a Notice of Removal on March 25, 2025, removing the State Action to  
 5 this Court.

6           4. On March 26, 2025, counsel for Plaintiff informed Defendant’s counsel that Plaintiff  
 7 would be filing a First Amended Complaint.

8           THEREFORE THE FOLLOWING IS HEREBY STIPULATED, AGREED, AND  
 9 CONSENTED TO by. and between the Parties:

10          1. Defendants consent to granting leave for Plaintiff to file a First Amended Complaint;  
 11          2. Plaintiff’s First Amended Complaint should be filed on or before April 18, 2025;  
 12          3. Defendants shall respond to Plaintiff’s First Amended Complaint on or before May 8,  
 13 2025.

14 DATED: April 8, 2025

ANDERSON, McPHARLIN & CONNERS LLP

15 By: /s/ Vincent James John Romeo

16 Carleton R. Burch, Esq.

17 Vincent James John Romeo, Esq.

18 Attorneys for Defendants ARTHUR J. GALLAGHER  
 & CO.; and ARTHUR J. GALLAGHER RISK  
 19 MANAGEMENT SERVICES, LLC (erroneously sued  
 as Arthur J. Gallagher Risk Management Services, Inc.)

20 DATED: April 8, 2025

SEmenza Rickard Law

21 By: /s/ Jarrod L. Rickard

22 Jarrod L. Rickard, Esq.

23 Katie L. Cannata, Esq.

24 Attorneys for Plaintiff Armorock, LLC

ANDERSON, MCPHARLIN & CONNERS LLP  
 LAWYERS  
 601 S. SEVENTH STREET  
 LAS VEGAS, NEVADA 89101  
 TEL (702) 479-1010 • FAX (702) 479-1025

## ORDER

For the reasons stated above, and for good cause, it is hereby ordered that:

1. Plaintiff, Armorock, LLC shall be granted leave to file a First Amended Complaint.
2. Plaintiff, Armorock, LLC shall file its First Amended Complaint on or before April 18,
3. Defendants ARTHUR J. GALLAGHER & CO.; and ARTHUR J. GALLAGHER RISK MANAGEMENT SERVICES, LLC (erroneously sued as Arthur J. Gallagher Risk Management Services, Inc.) shall respond to Plaintiff, Armorock, LLC's First Amended Complaint on or before April 20, 2025.

## **IT IS SO ORDERED.**

Eugene J. Zouchal  
UNITED STATES MAGISTRATE JUDGE

DATED: April 9, 2025

ANDERSON, MCPHARLIN & CONNERS LLP  
LAWYERS  
601 S. SEVENTH STREET  
LAS VEGAS, NEVADA 89101  
TEL (702) 479-1010 • FAX (702) 479-1025